United States District Court Eastern District of Michigan Southern Division

United States of America,

Case No. 19-cr-20246

Plaintiff,

Honorable Denise Page Hood

v.

D-1 Conor Freeman,

D-2 Ricky Handschumacher,

D-3 Colton Jurisic,

D-4 Reyad Gafar Abbas,

D-5 Garrett Endicott,

D-6 Ryan Stevenson,

Defendant.

First Forfeiture Bill of Particulars

The United States, by and through its counsel, submits this First Forfeiture Bill of Particulars, pursuant to Rule7(f) of the Federal Rules of Criminal Procedure to supplement and clarify the forfeiture allegations contained in the Indictment and to provide notice of specific property the government intends to forfeit upon conviction.

The allegations set forth in the Indictment are re-alleged and incorporated herein by this reference for the purpose of providing notice of the forfeiture

allegations contained in the Indictment, pursuant to Federal Rule of Criminal Procedure 32.2(a) and 18 U.S.C. § 981(a)(1)(C) together with 28 U.S.C. § 2461(c) which includes, but is not limited to:

- Thirty-eight (38) Bitcoin seized from Ricky Handschumacher (approximate value of \$282,400 as of May 9, 2019);
- Nine hundred (900) Ethereum seized from Ricky Handschumacher (approximate value of \$434,035 as of May 9, 2019);
- 47.65088638 Bitcoin seized from Garrett Endicott (approximate value \$290,032 as of May 9, 2019);
- 1.1296771 Dash seized from Garrett Endicott (approximate value \$130 as of May 9, 2019);
- 10 Digibyte seized from Garrett Endicott (approximate value \$98 as of May 9, 2019);
- 20.7294867 Litecoin seized from Garrett Endicott (approximate value \$1,500 as of May 9, 2019);
- 32.2938135 Ethereum seized from Garrett Endicott (approximate value \$5,445 as of May 9, 2019);
- .07245236 Ethereum seized from Garrett Endicott (approximate value \$12 as of May 9, 2019);

- .00537818 Bitcoin seized from Garrett Endicott (approximate value \$32 as of May 9, 2019);
- One hundred fifty (150) Bitcoin seized from Colton Jurisic (approximate value \$911,797 as of May 9, 2019);
- Nineteen thousand, sixty dollars (\$19,060) U.S. Currency seized from Colton Jurisic;
- One hundred twenty-six (126) Bitcoin seized from Conor Freeman (approximate value \$960,988 as of May 9, 2019).

This Forfeiture Bill of Particulars is also filed to comply with the provisions of Title 18, United States Code, Section 983(a)(3), and the government reserves its right to file a civil forfeiture complaint regarding the identified property, if necessary, at the conclusion of this criminal action.

This notice does not limit the government from seeking the forfeiture of additional specific property, including substitute assets, or limit the government from seeking the imposition of a forfeiture money judgment.

Respectfully submitted,

Matthew Schneider United States Attorney

S/Shankar Ramamurthy

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Dated: June 13, 2019

Certification of Service

I hereby certify that on June 13, 2019, the foregoing document filed with the Clerk of the Court using the ECF system, which will electronically serve all ECF participants.

S/Shankar Ramamurthy

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